

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	Criminal No. 16-00351-01-CR-W-DGK
	)	
ANDRE M. HENRY,	)	
	)	
Defendant.	)	

**MEMORANDUM OF MATTERS DISCUSSED AND  
ACTION TAKEN AT PRETRIAL CONFERENCE**

**PENDING CHARGE:** The Indictment alleges that on or about October 27, 2016, the defendant, having previously been convicted of a felony, possessed a firearm that had traveled in interstate commerce.

The following matters were discussed and action taken during the pretrial conference:

**TRIAL COUNSEL:**

Government: Alison Dunning  
Case Agent: Task Force Officer Jason Cramblit of the KCMOPD  
Defense: Robert Kuchar

**OUTSTANDING MOTIONS:**

04/24/2017	<a href="#">31</a>	NOTICE of filing <i>Government's Notice of Expert Witness</i> by USA as to Andre M Henry (Dunning, Alison) (Entered: 04/24/2017)
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**TRIAL WITNESSES:**

Government: 3 with stipulations; 4 without stipulations  
Defendants: No witnesses other than possibly the defendant

**TRIAL EXHIBITS**

Government: 13-20 exhibits depending on whether a video is divided into smaller segments  
Defendant: 0 exhibits beyond those identified by the government

**DEFENSES:** General Denial

**POSSIBLE DISPOSITION:**

( ) Definitely for trial; (X ) Possibly for trial; ( ) Likely a plea will be worked out

**TRIAL TIME: 1 1/2 -2 days**

Government's case including jury selection: 1 1/2-2 days

Defense case: Encompassed in the time set forth above

**STIPULATIONS:** The government has proposed two stipulations concerning (1) defendant's prior convictions and (2) the nexus of the firearm. The defendant is considering the proposals.

**UNUSUAL QUESTIONS OF LAW:** None

**FILING DEADLINES:**

**Witness and Exhibit List**

Government: Filed on 4/24/17

Defense: No witnesses or exhibits anticipated except as noted above.

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**Exhibit Index, Voir Dire, Jury Instructions: Noon, Wednesday, May 3, 2017.**

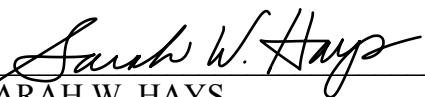
**Please Note:** Jury instructions must comply with Local Rule 51.1

**Motion in Limine:** The government will file a notice of its intent to use prior convictions for impeachment. If defendant decides to file a motion in limine to exclude the drugs recovered from inside the car, counsel will do so by May 1, 2017. If the motion in limine is filed, the government will respond by May 5, 2017.

**TRIAL SETTING:** Criminal jury trial docket set for May 8, 2017.

**Please note:** Due to witness availability issues, the case needs to be set the second week of the docket.

**IT IS SO ORDERED.**

  
SARAH W. HAYS  
United States Magistrate Judge